

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DR. SHIVA AYYADURAI,

Plaintiff,

v.

WILLIAM FRANCIS GALVIN, in his official  
capacity as the Secretary of the Commonwealth  
of Massachusetts,

Defendant.

CIVIL ACTION  
NO. 1:20-cv-11889-MLW

**JOINT STATUS REPORT**

Pursuant to the Court's order of October 30, 2020, Plaintiff Dr. Shiva Ayyadurai and Defendant William Francis Galvin, in his official capacity as Secretary of the Commonwealth, hereby submit this joint status report.

The parties have not agreed that this case should be dismissed. Plaintiff has filed an Amended Complaint that asserts additional claims against newly added Defendants, including William F. Galvin in his individual capacity. Undersigned defense counsel offered to accept and complete waivers of the service of summonses on behalf of Secretary Galvin, in his official and individual capacities, Michelle Tassinari, in her individual capacity, and Debra O'Malley, in her individual capacity. Plaintiff has chosen to serve them in hand via a sheriff instead in order to move this litigation along without preventable delay. Plaintiff notes that the Attorney General intends to defend the individuals at public expense against claims alleging intentional torts.

Defendants anticipate that they will move to dismiss the Amended Complaint and Plaintiff will oppose such motions to dismiss.

The parties submit that discovery should be stayed until these motions to dismiss are resolved. Once the motions to dismiss are resolved, Plaintiff requests that fact discovery be completed within three months, with another two months for expert discovery. Defendants request that fact discovery be completed within six months, with another three months for expert discovery.

Respectfully submitted,

DR. SHIVA AYYADURAI

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WILLIAM FRANCIS GALVIN,  
in his official capacity,

By his Attorneys,

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**CERTIFICATE OF SERVICE**

I certify that this document, filed through the Court's ECF system, will be sent electronically to registered participants as identified on the Notice of Electronic Filing (NEF) and that a copy will be sent to those indicated as non-registered participants by email on November 13, 2020.

/s/ Adam Hornstine  
Adam Hornstine  
Assistant Attorney General